

**From:** [Cisse Spragins](#)  
**To:** [Laws, Meredith](#)  
**Subject:** RE: Letter from Dr. Steven Bradbury Concerning Neonicotinoid Registrations  
**Date:** Sunday, July 28, 2013 5:04:35 PM

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Re: Production Cycle and Label Printing

Ms. Laws:

Rockwell has two registrations containing neonicotinoids, both baits from crawling insects containing imidacloprid, labeled for non-crop uses:

InVict Cockroach Gel – 73079-10 – structural (indoor and outdoor) use cockroachgel bait  
Imidacloprid Granular Bait – 73079-14 – structural and turf use granular bait for roaches, ants, crickets, mole crickets, silverfish, firebrats, and earwigs

As far as production scheduling is concerned, we are a small producer and we produce the products in-house as we need them. We don't hold large inventories of product as we endeavor to ship baits as fresh as possible. Most baits are not in our inventory longer than one to two months, though it may be a bit longer for slow-moving items.

As far as packaging is concerned, as a niche product manufacturer, our time between packaging orders is pretty long due to the very high cost of ordering small runs of printed packaging. For 73079-10, we expect to order more boxes in the middle of next year – May and July respectively for the two box sizes we have.

For 73079-14, it is a very new product and we don't have any sort of use history established nor a lot of sales at this point. We don't know when we will need to order more packaging for this. We are currently offering five skus, so it will likely vary based on sales rates of each sku and amount of each packaging type ordered, but we don't foresee needing to reorder any packaging for at least a year.

Please let us know if you have any further questions.

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**From:** Laws, Meredith [mailto:[Laws.Meredith@epa.gov](mailto:Laws.Meredith@epa.gov)]  
**Sent:** Monday, July 22, 2013 12:01 PM  
**Subject:** Letter from Dr. Steven Bradbury Concerning Neonicotinoid Registrations

Dear Registrants & Agents:

Please read the attached letter from Dr. Steven Bradbury, Director of EPA's Office of Pesticide Programs. The letter is pertaining to your products containing the nitroguanidine neonicotinoids.

We are asking that you acknowledge receipt of this email within 48 hours.

Thank you,

Meredith Laws  
Chief, Insecticide-Rodenticide Branch  
Registration Division  
Office of Pesticide Programs  
(703) 308-7038  
[www.epa.gov/pesticides](http://www.epa.gov/pesticides)